

SMITH | VILLAZOR

Smith Villazor LLP
250 West 55th Street, 30th Floor
New York, NY 10019
www.smithvillazor.com

RODNEY VILLAZOR
T 212 582 4400
D 212 377 0852
rodney.villazor@smithvillazor.com

August 29, 2022

VIA ECF

Honorable Michael A. Hammer
United States District Court for the
District of New Jersey
Martin Luther King Courthouse
50 Walnut Street Room 2C
Newark, NJ 07101

**Re: *United States v. Matthew Goettsche, et al.*, 19-CR-877 (CCC)
Proposed Modification of Pretrial Release Order**

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goettsche. We respectfully move to modify his bail conditions to allow him to attend the wake, funeral and repast of his family relative in the Lakewood, Colorado area. The times and locations will be pre-approved by Pretrial, and Mr. Goettsche will be accompanied by a third-party custodian at all times.

The Court's Order Setting Conditions of Release (dkt. 171) requires Mr. Goettsche remain at his residence under home incarceration and that he "shall remain in the presence of a third-party custodian at all times unless otherwise approved by Pretrial Services." The Court previously approved other proposed consent bail modifications to these conditions (dks 187, 193, 225, 229, and 251).¹

Pretrial Services has no objection to this proposed request. The government, through AUSA, Anthony Torntore defers to Pretrial Services. Thank you in advance.

Respectfully submitted,

/s/

Rodney Villazor, Esq.
SMITH VILLAZOR LLP

¹ We withdraw our previous motion to modify bail conditions to allow Mr. Goettsche to visit the same relative in Lakewood, Colorado as moot (dkt. 256).

Hon. Michael A. Hammer

August 29, 2022

Page Two

cc: Andrew Lourie, Esq.
Benjamin Sauter, Esq.
Amanda Tuminelli, Esq.
Government counsel of record (via ECF and e-mail)
U.S. Pretrial Services Officer David Hernandez (via e-mail)
U.S. Pretrial Services Officer Troy Ruplinger (via e-mail)